

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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| IN THE MATTER OF |) | |
| THE EXTRADITION OF |) | Docket No.: 24-mj-01365-DLC |
| EYLEM TOK |) | |

**UNOPPOSED MOTION BY PETITIONER FOR ORDER TO CONDUCT
PROBATION OFFICE INVESTIGATION AND INTERVIEW**

Ms. Tok moves that the Court order the United States Probation Department (“Probation Office”) to conduct an investigation and interview of Ms. Tok. The Probation Office will not conduct an investigation and interview in an extradition matter without a court order, and the Probation Office will not provide any recommendation to the Court. Upon consultation, the government has advised that it does not object to Ms. Tok’s request.

Ms. Tok intends to request a detention hearing in this matter. At that hearing, Ms. Tok will argue that she should be released from detention based on special circumstances. *See, e.g., United States v. Casteneda-Castillo*, 739 F. Supp. 2d 49, 55 (D. Mass. 2010) (providing the standard for release in extradition cases). In connection with any decision to release Ms. Tok, the Court must also find that she is “neither a risk of flight nor a danger to any person or the community.” *Id.* Thus, an investigation and report by the Probation Office is a critical element of this inquiry. Therefore, Ms. Tok requests that the Court enter an order directing the Probation Office to conduct an investigation and interview of Ms. Tok, in the interests of justice.

Respectfully submitted,

ELYEM TOK

By her Attorney,

/s/ Brendan Kelley

Brendan Kelley

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on June 18, 2024.

/s/ Brendan Kelley

Brendan Kelley